

UNITED STATES DISTRICT COURT

NORTHERN

DISTRICT OF

ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ADEGBITE OLAMREWAJU ADEYEMO  
also known as Akangbe A. Lanre,  
and Larry Ade Aide

CASE NUMBER:

08CR

354

CRIMINAL COMPLAINT

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT  
MAGISTRATE JUDGE DENLOW

FILED

MAY 02 2008

NF

I, the undersigned complainant, being duly sworn on oath, state that the following is true and correct to the best of my knowledge and belief. On or about April 30, 2008, at Chicago O'Hare International Airport, Illinois, in the Northern District of Illinois, Eastern Division, ADEGBITE OLAMREWAJU ADEYEMO, defendant herein,

knowingly and willfully did make a materially false, fictitious and fraudulent representation in a matter within the jurisdiction of the United States Customs and Border Protection, an agency within the executive branch of the Government of the United States, in that he falsely represented his identity in a U.S. Customs Form 6049B; *ad. S M.D.*

in violation of Title 18, United States Code, Section 1001(a). I further state that I am an Enforcement Officer with the U.S. Customs and Border Protection and that this complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.

*Alfredo Rivera, Jr.*  
\_\_\_\_\_  
Signature of Complainant

ALFREDO RIVERA

Enforcement Officer, U.S. Customs and Border Protection

Sworn to before me and subscribed in my presence,

May 2, 2008  
Date

at Chicago, Illinois  
City and State

MORTON DENLOW, U.S. Magistrate Judge  
Name & Title of Judicial Officer

*Morton Denlow*  
\_\_\_\_\_  
Signature of Judicial Officer

State of Illinois       )  
                                  )  
County of Cook        )

**AFFIDAVIT**

I, Alfredo Rivera, Jr., being duly sworn on oath, state as follows:

1. I am an Enforcement Officer with U.S. Customs and Border Protection (CBP). I have been employed as an Officer for more than 5 years. As part of my regular duties, I investigate the entries and attempted entries of prior deported illegal aliens into the United States. The information contained in this affidavit is based on observations, investigation, my experience and information from other participating federal law enforcement officers.
2. This affidavit is submitted for the limited purpose of establishing probable cause in this case. I have set forth only the facts that I believe are necessary to establish probable cause in this matter. This is not a complete statement of all that I know about Adegbite Olamrewaju ADEYEMO (aka Akangbe A. LANRE) or the events described in this affidavit.
3. On April 30, 2008, ADEYEMO, using the name Akangbe A. LANRE, presented himself for admission to the United States at Chicago O'Hare International Airport. He arrived on KL 611 from Amsterdam, Netherlands, and was met by U.S. Customs and Border Protection Officers at which time he presented himself for inspection using a Nigerian passport number A0591942 in the name of Akangbe Ade LANRE with a date of birth of January 11, 1954. The defendant also presented to CBP Officers for admission into the United States his unexpired U.S. Resident Alien Card (A093-073-896) and signed CBP Form 6059B in the name of Akangbe A. LANRE. The defendant was referred and escorted to CBP Passport Control Secondary. The CBP Form required the defendant to fill in his name and date of birth. The defendant wrote in "Akangbe Lanre" and "January 11, 1954". The form required a signature under the words, "I have read the important information on the reverse side of this form and have made a truthful declaration." The defendant signed, "A Lanre" and dated the form "30/4/08".
4. The defendant's fingerprints were submitted to the Federal Bureau of Investigation (FBI). The results indicated that his fingerprints were an exact match for FBI record number 467059AA2. The record listed his name as Larry Ade AIDE with a date of birth of December 1, 1952, and listed his place of birth as Chicago, Illinois. Included in this record is a 1983 conviction for one count of credit card fraud with a sentence of 2 years under the name of "Larry Ade AIDE".
5. On or about April 15, 1983, defendant was arrested by Immigration and Naturalization Service (INS) for violation of 241(a)(4) of the Immigration and

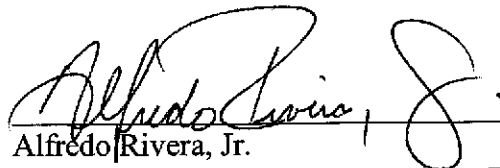
Nationality Act (INA) under the name of Adegbite Olamrewaju ADEYEMO (A#024-429-642). ADEYEMO was using the date of birth of January 12, 1955. The fingerprints of ADEYEMO match the fingerprints of the defendant, who CBP stopped on April 30, 2008, at Chicago O'Hare International Airport.

6. Department of Homeland Security (DHS) records reflect that Adegbite ADEYEMO was ordered deported from the United States on February 27, 1986, pursuant to Sec. 241(a)(4) of the INA.
7. DHS records reveal that the defendant applied for Temporary Residency in the United States based on Special Agricultural Worker status in or around January 1989, using the name Akangbe Ade LANRE with a date of birth of January 11, 1954.
8. Defendant was subsequently granted Lawful Permanent Resident status in the United States, S-26 classification, on or about December 1, 1990, as a result of the application filed with the U.S. Immigration and Naturalization Service under the name of Akangbe Ade LANRE (A# 093-073-896).
9. Defendant last obtained a U.S. Permanent Resident Card (I-551) with the name Akangbe A LANRE (A# 093-073-896) on or about November 16, 2001, from the U.S. Immigration and Naturalization Service.
10. Defendant has presented himself for admission into the United States after traveling overseas, including to Nigeria, by presenting the I-551 last issued to him in the name Akangbe Ade LANRE, and a Nigerian passport in the name of Akangbe Ade LANRE on 5 separate occasions within the last five years.
11. The United States Customs and Border Protection is an agency within the executive branch of the United States. The accuracy and veracity of information placed by travelers on US Customs Form 6049B for entry into the United States are matters within CBP's jurisdiction.

S. A. J.  
M. O.

12. Based on the foregoing information and my experience in investigating violations of U.S. immigration law, I believe that there is probable cause to believe that Adegbite Olamrewaju ADEYEMO has violated Title 18, United States Code, Section 1001(a) by falsely representing his identity to a representative of the U.S. Customs Border Protection.

FURTHER AFFIANT SAYETH NOT

A handwritten signature in cursive script, appearing to read "Alfredo Rivera, Jr.", written over a horizontal line.

Alfredo Rivera, Jr.  
U.S. Customs and Border Protection Enforcement Officer

Subscribed and SWORN TO BEFORE ME  
This 2nd day of May, 2008

A handwritten signature in cursive script, appearing to read "Morton Denlow", written over a horizontal line.  
MORTON DENLOW  
United States Magistrate Judge